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October 28, 2020

VIA ECF

Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Jane Doe v. Harvey Weinstein, Case No. 20-cv-6240 (MKV)***

Dear Judge Vyskocil,

We represent Defendant Harvey Weinstein ("Mr. Weinstein") in the above-referenced matter. On September 3, 2020, this respected Court denied Plaintiff's Motion to Proceed Under a Pseudonym (Dkt. No. 12). Since that date, the Plaintiff has not yet refiled her Complaint in this matter with her identity revealed. As such, this matter hangs in limbo, with salacious accusations publicly levied against Mr. Weinstein, yet no ability to respond and assert his defense. This, in simple terms, is utterly unfair.

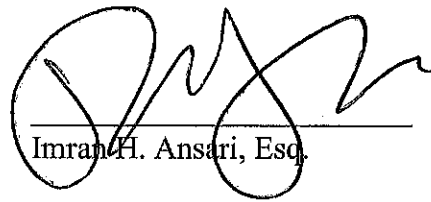
Tried in the court of law, yet already hanged, drawn and quartered in the court of public opinion, Mr. Weinstein embodies the publicly vilified individual who, through the protections afforded by constitutional due process of law bestowed upon *all* citizens of this country, is in a particular need to avail himself of these fundamental due process rights. This includes the right to know his accuser, who has publicly made claims of the most serious nature against him behind the cloak of anonymity, and to put forth his defense against those claims, and hold the Plaintiff to her burden of proof.

No matter how many salacious accusations are hurled at him; no matter how many times his name is dragged through the mud by the media and overzealous advocates; and no matter how many charges a prosecutor may pile on him in another court of law, those rights should not be given short shrift, nor taken for granted. Expeditious and fair adjudication of the claims and allegations made against him are no less desirous to *this* defendant simply because he is "Harvey Weinstein". In fact, it is particularly important, as some may perceive him as an "easy target", and

be compelled to bring claims that lack merit in the pursuit of financial or personal gain, or a fleeting moment of notoriety in a tabloid. Purportedly, that is not the case here, and therefore, the Plaintiff should file her Complaint, with her identity revealed, so that Mr. Weinstein may respond to *that* pleading in his defense.

Wherefore, we respectfully request that this Court issue an Order directing the Plaintiff to refile her Complaint, under her true identity, so as to afford Mr. Weinstein the ability to respond to the Complaint, and defend against the claims and allegations made against him therein.

Respectfully Submitted,



Imran H. Ansari, Esq.